

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

SOLAS OLED LTD., an Irish corporation,

Plaintiff,

v.

LG Display Co., Ltd., a Korean corporation;  
LG Electronics Inc., a Korean corporation;  
LG Display America, Inc., a California corporation;  
LG Electronics USA, Inc., a Delaware corporation;  
Sony Corporation, a Japanese corporation; and  
Sony Electronics Inc., a Delaware corporation;

Defendants.

**CASE NO. 6:19-CV-00236-ADA**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Solas OLED Ltd. and Defendants LG Display Co., Ltd., LG Electronics Inc., LG Display America, Inc., LG Electronics USA., Inc., Sony Corporation, and Sony Electronics Inc. (collectively, the “Parties”) submit this Joint Motion to stay all deadlines in this case.

Good cause supports this request because the Parties have finalized and entered into a settlement agreement as to all matters in controversy in this case. Accordingly, the Parties request that the Court stay all deadlines in this case until February 19, 2021, while the Parties complete their obligations under the agreement and prepare appropriate dismissal papers.

A proposed order is attached.

Respectfully submitted,

*/s/ Philip X. Wang*  
Marc Fenster  
California State Bar No. 181067

Email: [mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
Reza Mirzaie  
Email: [rmirzaie@raklaw.com](mailto:rmirzaie@raklaw.com)  
California State Bar No. 246953  
Paul A. Kroeger  
California State Bar No. 229074  
Email: [pkroeger@raklaw.com](mailto:pkroeger@raklaw.com)  
Philip X. Wang  
California State Bar No. 262239  
[pwang@raklaw.com](mailto:pwang@raklaw.com)  
Kent N. Shum  
California State Bar No. 259189  
Email: [kshum@raklaw.com](mailto:kshum@raklaw.com)  
Jonathan Ma  
California State Bar No. 312773  
Email: [jma@raklaw.com](mailto:jma@raklaw.com)  
**RUSS AUGUST & KABAT**  
12424 Wilshire Blvd. 12th Floor  
Los Angeles, CA 90025  
Tel: 310.826.7474

**ATTORNEYS FOR PLAINTIFF SOLAS  
OLED, LTD.**

*/s/ Douglas E. Lumish*  
\_\_\_\_\_  
Jennifer H. Doan  
Texas Bar No. 08809050  
Email: [jdoan@haltomdoan.com](mailto:jdoan@haltomdoan.com)  
Joshua R. Thane  
Email [jthane@haltomdoan.com](mailto:jthane@haltomdoan.com)  
Texas Bar No. 24060713  
J. Randy Roser  
Email: [troser@haltomdoan.com](mailto:troser@haltomdoan.com)  
Texas Bar No. 24089377  
Cole A. Riddell  
Email: [criddell@haltomdoan.com](mailto:criddell@haltomdoan.com)  
Texas Bar No. 24105423  
**HALTOM & DOAN**  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Tel: 903.255.1000  
Fax: 903.255.0800

Douglas E. Lumish  
California State Bar No. 183863

Email: doug.lumish@lw.com  
Gabriel S. Gross  
California State Bar No. 254672  
Email: gabe.gross@lw.com  
Patricia Young  
California Bar No. 291265  
Email: patricia.young@lw.com  
Clara Wang  
California Bar No. 321496  
Email: clara.wang@lw.com  
Linfong Tzeng  
California State Bar No. 281798  
linfong.tzeng@lw.com  
**LATHAM & WATKINS LLP**  
140 Scott Drive  
Menlo Park, CA 94025  
Tel: 650.328.4600  
Fax: 650.463.2600

Joseph H. Lee  
California State Bar No. 248046  
Email: joseph.lee@lw.com  
**LATHAM & WATKINS LLP**  
650 Town Center Drive, 20th Floor  
Costa Mesa, CA 92626  
Tel: 714.540.1235  
Fax: 714.755.8290

Blake R. Davis  
California State Bar No. 294360  
Email: blake.davis@lw.com  
Allison Harms  
California State Bar No. 299214  
allison.harms@lw.com  
**LATHAM & WATKINS LLP**  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Tel: 415.391.0600  
Fax: 415.395.8095

Bert C. Reiser  
District of Columbia Bar No. 451942  
Email: bert.reiser@lw.com  
**LATHAM & WATKINS LLP**  
555 Eleventh Street, N.W.  
Suite 1000

Washington, DC 20004  
Tel: 202.637.2200  
Fax: 202.637.2201

Daniel Ripley McNeely  
Illinois Bar No. 6293352  
Email: [daniel.mcneely@lw.com](mailto:daniel.mcneely@lw.com)  
**LATHAM & WATKINS LLP**  
330 North Wabash Avenue, Suite 2800  
Chicago, IL 60611  
Tel: 312.876.7700  
Fax: 312.993.9767

Michael A. David  
New York Bar No. 4342341  
Email: [michael.david@lw.com](mailto:michael.david@lw.com)  
**LATHAM & WATKINS LLP**  
885 Third Avenue  
New York, NY 10022-4834  
Tel: 212.906.1200  
Fax: 212.751.4864

**ATTORNEYS FOR DEFENDANTS**

Gregory S. Gewirtz (*pro hac vice*)  
Email: [ggewirtz@lernerdavid.com](mailto:ggewirtz@lernerdavid.com)  
Jonathan A. David (*pro hac vice*)  
Email: [jdavid@lernerdavid.com](mailto:jdavid@lernerdavid.com)  
**LERNER, DAVID, LITTENBERG,  
KRUMHOLZ & MENTLIK, LLP**  
20 Commerce Drive  
Cranford, NJ 07016  
Tel: 908.654.5000  
Fax: 908.654.7866  
Email: [litigation@lernerdavid.com](mailto:litigation@lernerdavid.com)

**ATTORNEYS FOR DEFENDANTS  
SONY CORPORATION AND SONY  
ELECTRONICS INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 6, 2021, I electronically filed this document with the Clerk of Court via the Court's CM/ECF system which will send notification of such filing to all counsel of record, all of whom have consented to electronic service in this action.

*/s/ Philip X. Wang*  
Philip X. Wang